

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Digital Audio Broadcasting Systems	)	
And Their Impact On the Terrestrial Radio	)	MM Docket No. 99-325
Broadcast Service.	)	

**COMMENTS OF NAUTEL LIMITED AND NAUTEL MAINE, INC.**

Nautel Limited and Nautel Maine, Inc. (“Nautel”) hereby file their comments to the Federal Communications Commission’s public notice seeking comment on the National Radio System Committee’s (“NRSC”) AM IBOC report. *Comments Sought on National Radio Systems Committee DAB Subcommittee’s ‘Evaluation of the iBiquity Digital Corporation IBOC System’*, MM Docket No. 99-325, DA 02-899 (April 19, 2002) (“Public Notice”). The NRSC report evaluates iBiquity Digital Corporation’s (“iBiquity”) AM In-Band On-Channel (“IBOC”) Digital Audio Broadcasting (“DAB”) technology and recommends that the FCC adopt AM IBOC as a daytime only service.

Nautel is one of the largest suppliers of transmission equipment to the United States broadcast industry. Nautel has already provided the FCC with its views about iBiquity’s FM IBOC system and has encouraged the FCC to promptly endorse the IBOC system. Nautel renews this recommendation in light of the NRSC’s recent endorsement of the AM IBOC system.

Nautel has worked closely with iBiquity on the details of the commercial implementation of the AM IBOC system. As was noted in Nautel’s previous comments, several Nautel transmitters were used for iBiquity’s AM test program. The NRSC’s

recommendation of the AM IBOC system are consistent with Nautel's own experience with the system. Nautel agrees with the NRSC that AM IBOC has the potential to transform AM broadcasting by allowing broadcasters to offer new services and formats. The improved audio quality and increased robustness of the AM IBOC system will greatly benefit listeners. At the same time, the NRSC was able to conclude that the introduction of AM IBOC will not cause harmful interference to existing daytime analog operations.

The NRSC determined it lacked sufficient information about AM IBOC operations at night to reach definitive conclusions about nighttime service. Nonetheless, the NRSC was enthusiastic about AM IBOC and endorsed AM IBOC for daytime service in order to expedite the introduction of the benefits of IBOC. The FCC should accept the NRSC's recommendation and proceed with an endorsement of AM IBOC for daytime service. This interim step, if enacted promptly, will facilitate the commencement of digital broadcasting this fall. Any such interim authorization of AM IBOC for daytime service will allow IBOC to move forward while iBiquity and the NRSC examine in greater detail the performance of AM IBOC at night. Nautel would anticipate that additional information about AM IBOC operation at night would be available before the FCC adopts final IBOC rules next year.

Prompt FCC action is imperative to ensure the successful commercial introduction of IBOC technology. Nautel launched the sale of commercial IBOC transmission equipment last month at the NAB Show in Las Vegas. The industry reaction greatly exceeded Nautel's expectations. Numerous broadcasters have discussed with Nautel options for implementing IBOC, and Nautel is prepared to support IBOC

implementation for stations later this year. It is Nautel's understanding that iBiquity intends to promote commencement of digital broadcasts in six rollout cities this fall. The commencement of digital broadcasts is essential to the successful launch of commercial IBOC receivers scheduled for the Consumer Electronics Show in January 2003. However, the continued absence of an FCC endorsement of IBOC will slow this commercial launch and prevent the introduction of IBOC technology. Nautel encourages the Commission to ensure that regulatory delay does not impede the broadcast industry's decision to move forward with IBOC implementation by immediately endorsing FM IBOC and daytime operation of AM IBOC.

Respectfully submitted,

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